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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE ESTATE OF BARRY ISOM, by and)	
through its Executrix, Mary Love-Isom; Jaime)	
Isom Newberry and Kimberly Isom Grindstaff;)	
)	
Plaintiffs,)	Case No. 2:14-cv-00475-RFB-VCF
)	
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	

STIPULATION AND ORDER FOR TRAVEL COSTS

The parties, by and through their respective counsel of record, hereby stipulate and agree that Plaintiffs' counsel reimburse the United States for travel costs related to taking Plaintiff Kimberlee Isom Grindstaff's deposition in Sacramento, California, on June 3, 2015.

Generally, a plaintiff must be deposed in the place where suit is filed. In this case, rather than file a discovery motion attempting to enforce this general rule, the parties met, conferred and agreed that counsel for the United States would travel to Plaintiff's location for the deposition and Plaintiff would pay Federal Defendant's related travel costs.

1 Under Government financial rules, to effectuate this agreement and allow Plaintiffs to reimburse
2 the United States, the parties' agreement must be reduced to a court order.

3 WHEREFORE, the parties respectfully request that the Court order Plaintiffs' counsel to
4 reimburse Federal Defendant for \$577.11 in travel costs for its travel to and from Sacramento,
5 California, to conduct Plaintiff Kimberlee Isom Grindstaff's deposition on June 3, 2015. The parties
6 further agree that neither party will claim these costs as additional compensation or reimbursable costs
7 to be taxed by the Court.

8 Respectfully submitted this 8th day of June 2015.

9 CRAIG A. MARQUIZ
10 Marquiz Law Office, PC
11 JUSTICE LAW CENTER

12 /s/ Alissa C. Engler
13 BRET O. WHIPPLE, ESQ.
14 ALISSA C. ENGLER, ESQ.
15 Attorneys for Plaintiffs

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16 /s/ Krystal J. Rosse
17 BLAINE T. WELSH
18 KRYSTAL J. (GALLAGHER) ROSSE
19 Assistant United States Attorneys
20 Attorneys for the United States

21 IT IS SO ORDERED:

22 
23 UNITED STATES MAGISTRATE JUDGE

24 DATED:

25 June 10, 2015
26